

IN THE DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION

CASE NO. 2:23-CV-351-AWA-LRL

JACOB GAVIN HILES,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

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**PLAINTIFF'S NOTICE PURSUANT TO RULE 7(E)**

Plaintiff, Jacob Gavin Hiles (“Hiles” and/or “Plaintiff”), by and through his undersigned counsel, hereby submits this notice to the Honorable Court for a ruling on the Plaintiff’s Request for Clerk’s Entry of a Default (Dkt. 17):

On or about February 14, 2024, Counsel for Plaintiff conferred with Counsel for Defendant. While the Plaintiff is not requesting a hearing on Plaintiff’s Request for Clerk’s Entry of Default, Counsel for Defendant informed Counsel for Plaintiff that the Defendant is requesting a hearing on the Request for Clerk’s Entry of Default and Plaintiff does not object to the Defendant’s request for a hearing. Notwithstanding, Plaintiff does not believe a hearing is warranted because Plaintiff filed a Request for Clerk’s Entry of Default which should be automatically entered pursuant to Local Rule 7E and the Rule 55 Federal Rules of Civil Procedure.

Dated: February 20, 2024

Respectfully submitted,

**BUSH & TAYLOR, P.C.**  
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By:                     /s/                      
**ALEXANDER H. BELL**  
Virginia Bar No. 84859

By:                     /s/                      
**DONALD J. HODSON**  
Florida Bar No. 120256

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Court this 11th day of September 2023, and electronically served via the Court's e-filing system on the following individual(s): Jay Ward Brown, Esq., Ballard Spahr, LLP, 1909 K Street NW, 12th Floor, Washington, D.C., 20006, [brownjay@ballardspahr.com](mailto:brownjay@ballardspahr.com), [miskinm@ballardspahr.com](mailto:miskinm@ballardspahr.com), and [russelll@ballardspahr.com](mailto:russelll@ballardspahr.com).

By:                     /s/                      
**ALEXANDER H. BELL**